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Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC.,

Plaintiff,

vs.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

**STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINES FOR
EXPERT DISCOVERY, EXPERT
REPORTS, AND DISPOSITIVE
MOTIONS**

1 Pursuant to Civil Local Rule 6-2, Google LLC (“Google”) and Sonos, Inc. (“Sonos”)
2 (collectively, “Parties”) jointly stipulate and request an order extending the deadlines for expert
3 discovery, expert reports, and dispositive motions.

4 WHEREAS, Google filed a Motion for Leave to Amend Invalidity Contentions Pursuant to
5 Patent L.R. 3-6 (“Motion for Leave,” Dkt. 336) on August 30, 2022;

6 WHEREAS, non-expert discovery closed on November 30, 2022 (Dkt. 67);

7 WHEREAS, opening expert reports were served on November 30, 2022 (*id.*);

8 WHEREAS, the Court granted Google’s Motion for Leave on December 8, 2022 (Dkt. 418);

9 WHEREAS, during the hearing on Google’s Motion for Leave on December 8, 2022, the
10 Court “allow[ed] Sonos to have the discovery that it needs on [] two [YouTube] engineers” in light
11 of the new amendments to Google’s invalidity contentions (Dkt. 425 at 32:1-2);

12 WHEREAS, the Court noted during the hearing that “[i]f this means that you need more
13 time on the opposition expert report, I will be favorably inclined to that” (*id.* at 32:7-8);

14 WHEREAS, the two YouTube engineers Sonos intends to depose live and work in
15 Switzerland, which requires the issuance of letters rogatory before any deposition, and are further
16 traveling on pre-planned Christmas vacations during the second half of December (Declaration of
17 James Judah ¶ 4);

18 WHEREAS, the Parties met and conferred on a case schedule that would permit adequate
19 time to take the two depositions, consider them in rebuttal and reply expert reports, and address
20 them in dispositive motions (*id.* ¶ 5);

21 WHEREAS, the Parties agree that continuing the deadlines for expert discovery, expert
22 reports, and dispositive motions will not affect the Parties’ ability to comply with the other deadlines
23 set forth in this case;

24 THE PARTIES HEREBY STIPULATE, AGREE, AND REQUEST, that the Court modify
25 the current expert discovery, expert report, and dispositive motion deadlines as follows:
26
27
28

Event	Current Deadline	Proposed Deadline
Deadline for rebuttal expert reports	December 23, 2022 (Dkt. 402)	January 13, 2023
Deadline for reply expert reports	January 5, 2023 (Dkt. 402)	January 23, 2023
Deadline for bringing discovery motions or extension motions based on discovery violations for expert discovery	January 13, 2023 (Dkt. 402)	January 27, 2023
Deadline for expert discovery	January 20, 2023 (Dkt. 402)	January 31, 2023
Deadline for dispositive motions	January 26, 2023 (Dkt. 67)	February 6, 2023

The Parties submit the accompanying declaration of James Judah in support hereof and respectfully request that the Court enter the attached proposed order.

IT IS SO STIPULATED.

Dated: December 21, 2022

Respectfully submitted,

/s/ Charles K. Verhoeven

/s/ Sean Sullivan

Attorneys for GOOGLE LLC

Attorneys for SONOS, INC.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

LEE SULLIVAN SHEA & SMITH LLP

Counsel for Google LLC

Counsel for Sonos, Inc.

ECF ATTESTATION

I, Charles K. Verhoeven, am the ECF User whose ID and password are being used to file this Joint Stipulation. In compliance with Civil Local Rule 5-1, I hereby attest that Sean Sullivan, counsel for Sonos, has concurred in this filing.

Dated: December 21, 2022

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2022 By: _____

Hon. William Alsup
United States District Judge